

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) Jeffrey Traurig TRAURIG LAW LLC One University Plaza, Suite 124 Hackensack, NJ 07601 Tel: (646) 974-8650 E-mail: jtraurig@trauriglawn.com <i>Local Counsel to the Fee Examiner</i>	Robert J. Keach, Esq. (admitted <i>pro hac vice</i>) BERNSTEIN SHUR SAWYER & NELSON, P.A. 100 Middle Street Portland, ME 04104 Tel: (207) 774-1200 Fax: (207) 774-1127 E-Mail: rkeach@bernsteinshur.com <i>Fee Examiner</i> BERNSTEIN SHUR SAWYER & NELSON, P.A. Letson Douglass Boots, Esq. (admitted <i>pro hac vice</i>) 100 Middle Street Portland, ME 04104 Tel: (207) 774-1200 Fax: (207) 774-1127 E-Mail: lboots@bernsteinshur.com <i>Counsel to the Fee Examiner</i>
In Re: LTL MANAGEMENT LLC, Debtor	Case No.: 21-30589 (MBK) Judge: Michael B. Kaplan Chapter 11

**SUMMARY COVER SHEET AND STATEMENT FOR THE
FIRST INTERIM FEE APPLICATION OF TRAURIG LAW LLC
FOR ALLOWANCE OF FEES AS COUNSEL TO THE FEE EXAMINER
FOR THE PERIOD MARCH 24, 2022 THROUGH MAY 31, 2022**

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Debtor: LTL Management LLC

Applicant: Taurig Law LLC

Case No.: 21-30589-MBK

Client: Counsel to Robert J.
Keach, Esq., (the "Fee
Examiner")

Chapter: 11

Case Filed: October 14, 2021
(the "Petition Date")

**SECTION 1
FEE SUMMARY**

☒ Interim Fee Application No. 1 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from March 24, 2022 through May 31, 2022 (the "Compensation Period").

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	\$7,310.00	\$0.00
Total Fees Allowed to Date:	<u>\$0.00</u>	<u>\$0.00</u>
Total Retainer (If Applicable):	<u>\$0.00</u>	<u>\$0.00</u>
Total Holdback (If Applicable):	<u>\$1,462.00</u>	<u>\$0.00</u>
Total Received by Applicant:	<u>\$5,848.00</u>	<u>\$0.00</u>

Fee Total:	\$7,310.00
Disbursement Total:	\$ 0.00
Total Fee Application	\$7,310.00

COMPENSATION BY PROFESSIONAL

The attorney(s) who rendered professional services in this chapter 11 case during the Compensation Period:

Name of Professional: Partner/Member	Year Admitted	Hourly Rate	Total Hours Billed	Total Fees
Jeffrey Traurig	1997	\$425.00	17.2	\$7,310.00

The total fees for the Compensation Period are:

Professionals	Blended Rate	Total Hours Billed	Total Fees
Partner/Member:	\$425.00	17.2	\$7,310.00
Blended Attorney Rate:	\$425.00	17.2	\$7,310.00
Blended Rate for All Timekeepers:	\$425.00	17.2	\$7,310.00
Total Fees Incurred:			\$7,310.00

SUMMARY OF SERVICES BY TASK CODE

DESCRIPTION	HOURS	AMOUNT
Case Administration/General	.6	\$255.00
Employment and Fee Applications	13.6	\$5,780.00
Employment and Fee Reports/Objections	3.0	\$1,275.00
Total Fees Requested	17.2	\$7,310.00

SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
N/A	--
DISBURSEMENTS TOTALS	\$0.00

I certify under penalty of perjury that the above is true.

Date: July 19, 2022

/s/Jeffrey Taurig
Jeffrey Taurig

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	<p>Robert J. Keach, Esq. (admitted <i>pro hac vice</i>) BERNSTEIN SHUR SAWYER & NELSON, P.A. 100 Middle Street Portland, ME 04104 Tel: (207) 774-1200 Fax: (207) 774-1127 E-Mail: rkeach@bernsteinshur.com <i>Fee Examiner</i></p> <p>BERNSTEIN SHUR SAWYER & NELSON, P.A. Letson Douglass Boots, Esq. (admitted <i>pro hac vice</i>) 100 Middle Street Portland, ME 04104 Tel: (207) 774-1200 Fax: (207) 774-1127 E-Mail: lboots@bernsteinshur.com <i>Counsel to the Fee Examiner</i></p>
<p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>Jeffrey Taurig TRAURIG LAW LLC One University Plaza, Suite 124 Hackensack, NJ 07601 Tel: (646) 974-8650 E-mail: jtaurig@trauriglawn.com <i>Local Counsel to the Fee Examiner</i></p>	
<p>In Re:</p> <p>LTL MANAGEMENT LLC,</p> <p style="text-align: center;">Debtor</p>	<p>Case No.: 21-30589 (MBK)</p> <p>Judge: Michael B. Kaplan</p> <p>Chapter 11</p>

**FIRST INTERIM FEE APPLICATION OF TRAURIG LAW LLC
FOR ALLOWANCE OF FEES AS COUNSEL TO THE FEE EXAMINER
FOR THE PERIOD MARCH 24, 2022 THROUGH MAY 31, 2022**

Taurig Law LLC (“Taurig Law”), counsel to the Fee Examiner, Robert J. Keach, Esq. (the “Fee Examiner”), submits its first interim fee application for allowance of fees of \$7,310.00 for the period from March 24, 2022 through May 31, 2022 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals* [Dkt. 761] and the *Order Appointing an Independent*

Fee Examiner and Establishing Procedures [Dkt. 1922] (together, the “Interim Compensation Order”). In support of this Application, Traurig Law respectfully represents as follows:

1. During the Compensation Period, Traurig Law did not receive any payments or promises of payment from any other source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this application other than in accordance with the Interim Compensation Order. There is no agreement or understanding between the Traurig Law and any other person, for sharing of compensation to be received for services rendered in this case.

2. The fees charged by Traurig Law in this case are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive national legal market.

3. Pursuant to Rule 2016-1 of the Local Rules of the United States Bankruptcy Court of New Jersey (the “Local Rules”) and the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013 (the “Guidelines”), included herewith are (a) a schedule setting forth all Traurig Law professionals who have performed services in this chapter 11 case during the Compensation Period, the hourly billing rate charged by Traurig Law for the services performed by such individual, the aggregate number of hours expended in this case during the Compensation Period and fees billed therefor and the year in which each professional was first licensed to practice law and (b) a summary of services by billing category for services rendered by Traurig Law during the Compensation Period. There were no disbursements that Traurig Law seeks reimbursement for during the Compensation Period.

4. Traurig Law's itemized time records for professionals performing services for the Fee Examiner during the Compensation Period were attached as Exhibit B to the previously-filed monthly fee applications (the "Prior Monthly Fee Applications"), which exhibits are incorporated herein by reference.

5. The compensation requested in this proceeding is reasonable based on the nature and extent of the services rendered, the size and complexity of this Chapter 11 Case, the time, labor, and special expertise brought to bear on the questions presented, and other related factors.

6. As described in further detail below, during the Compensation Period, the professional services performed by Traurig Law were necessary and appropriate to protect the rights and fulfill the obligations of the Fee Examiner (defined below) given the nature and complexity of the issues at hand, were in the best interests of the Fee Examiner and other parties in interest, and were performed in an expeditious and efficient manner. As such, Traurig Law submits that the compensation sought herein is reasonable within the meaning of sections 330 and 331 of the Bankruptcy Code.

7. This application complies with sections 330 and 331 of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Interim Compensation Order, the Guidelines, and the Local Rules.

Background

8. On October 14, 2021 (the "Petition Date"), the Debtor commenced this reorganization case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of North Carolina (the "NC Bankruptcy Court"). On November 16, 2021, the NC Bankruptcy Court entered an order [Dkt. 416] transferring the case to the District of New Jersey, which referred the case to this Court. The

Debtor is authorized to continue to manage its property and operate its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.¹

9. On March 31, 2022, the Court entered the Interim Compensation Order, which, among other things, appointed Robert J. Keach, Esq, as an independent fee examiner (the “Fee Examiner”).

10. On April 5, 2022 the Court entered an order [Dkt. 1966], attached hereto as Exhibit A, authorizing the retention of Traurig Law as the Fee Examiner’s counsel.²

Prior Monthly Fee Applications and Summary of Services Rendered

11. As set forth in the Application cover sheet submitted herewith, Traurig Law rendered a total of 17.2 hours of professional services during the Compensation Period, for which it seeks compensation of \$7,310.00.

12. Pursuant to the Interim Compensation Order, Traurig Law filed the following Prior Monthly Fee Applications for the months within the Compensation Period:

- a. For March 24, 2022 through April 30, 2022 -- fees of \$4,717.50 [Dkt. 2362]; and
- b. For April 1 - 30, 2022 -- fees of \$2,592.50 [Dkt. 2612].

13. To apprise this Court of the legal services rendered during the Compensation Period, Traurig Law sets forth the following summary. This summary is intended only to highlight certain categories of services in which Traurig Law devoted time and attention on behalf of the Fee Examiner.

- (a) Case Administration/General: This category relates to work in connection with general case administration. During the Compensation Period, Traurig Law prepared and filed its notice of appearance.

¹ This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

² Retained professionals may seek compensation for actual and necessary services rendered prior to the date of the court’s approval of such retention. *See In re Mallinckrodt PLC*, No. BR 20-12522-JTD, 2022 WL 906451, at *8 (D. Del. Mar. 28, 2022); *In re Benitez*, No. 8-19-70230-reg, 2020 WL 1272258, at *2-5 (Bankr. E.D.N.Y. Mar. 13, 2020).

Fees: \$255; Hours: .6

- (b) Employment and Fee Applications: This category relates to work in connection with the employment retention and fee applications of Traurig Law, Bernstein Shur Sawyer & Nelson, P.A. (“BSSN”), and the Fee Examiner. During the Compensation Period, Traurig Law drafted, reviewed and filed the (i) employment retention application, declarations and associated exhibits for Traurig Law and (ii) monthly fee statements for Traurig Law. During the Compensation period, Traurig Law also (i) reviewed and filed the employment retention application for BSSN, (ii) *pro hac vice* applications, certifications and proposed orders for BSSN and the Fee Examiner, and (iii) monthly fee statements for BSSN and the Fee Examiner.

Fees: \$5,780.00; Hours: 13.6

- (c) Employment and Fee Reports/Objections: This category relates to work in connection with objections and reports regarding the employment retention and fee applications of professionals (other than the Fee Examiner and his professionals) in the Debtor’s case. During the Compensation Period, Traurig Law participated in calls with the Fee Examiner, his other professionals, and the Office of the United States Trustee regarding the Fee Examiner’s report. Traurig Law also reviewed and filed the Fee Examiner’s first final report for interim fee applications.

Fees: \$1,275.00; Hours 3.0

14. Each Prior Monthly Fee Application also contained a summary of the activities performed by Traurig Law professionals during the Compensation Period.³

15. As of the date of this application, no party has objected to any of Traurig Law’s Prior Monthly Fee Applications.

Expenses Incurred By Traurig Law

16. Section 330 of the Bankruptcy Code authorizes “reimbursement for actual, necessary expenses” incurred by professionals employed in a chapter 11 case. Traurig Law is not seeking reimbursement for expenses incurred during the Compensation Period.

³ The summaries are qualified in their entirety by reference to the time and services detail attached as Exhibit B to each Prior Monthly Fee Application, which applications and exhibits are incorporated herein by reference.

Statement of the Applicant

17. Pursuant to section C5 of the Guidelines, Traurig Law makes the following statements:

- a. Traurig Law did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees or terms for services that were provided during the Compensation Period.
- b. The fees sought in this application are not in excess of any budgeted amount.
- c. The hourly rates of Traurig Law included in this application have not been varied based on the geographic location of this case.
- d. This application does not include any time or fees related to reviewing, revising or preparing invoices.
- e. This application does not include any rate increases since Traurig Law's retention.

Conclusion

18. The fees requested herein by Traurig Law are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive national legal market.

19. No agreement or understanding exists between Traurig Law or any third person for the sharing of compensation.

20. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Fee Examiner, and not on behalf of any other entity. In accordance with the Guidelines, the Certification of Jeffrey Traurig is attached hereto as Exhibit B and incorporated herein by reference.

21. WHEREFORE, Traurig Law respectfully requests that, pursuant to the Interim Compensation Order, the Court (a) allow on an interim basis compensation of \$7,310.00 for services rendered by Traurig Law during the Compensation Period, (b) authorize payment of these allowed fees to Traurig Law and (c) grant such other and further relief to Traurig Law as the Court may deem proper.

Dated: July 19, 2022

Respectfully submitted,

/s/ Jeffrey Traurig

Jeffrey Traurig, Esq.

TRAURIG LAW LLC

One University Plaza, Suite 124

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Tel: (646) 974-8650

E-mail: jtraurig@trauriglawn.com

Local Counsel to the Fee Examiner

EXHIBIT A

Retention Order



Order Filed on April 5, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Local Counsel to the Fee Examiner

In Re:

LTL MANAGEMENT LLC,

Debtor

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

Chapter 11

**ORDER AUTHORIZING RETENTION OF TRAURIG LAW LLC
AS COUNSEL TO THE FEE EXAMINER**

The relief set forth on the following page two (2) and three (3) is hereby **ORDERED**.

DATED: April 5, 2022


Honorable Michael B. Kaplan
United States Bankruptcy Judge

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

Upon the applicant's, Robert J. Keach (the "Fee Examiner"), request for authorization to retain Traurig Law LLC ("Taurig") as counsel to the Fee Examiner, it is hereby **ORDERED**:

1. The Fee Examiner is authorized to retain Traurig in the professional capacity noted in the Application.

The professional's address is: Traurig Law LLC
One University Plaza, Suite 124
Hackensack, NJ 07601

2. As provided in the *Order Appointing an Independent Fee Examiner and Establishing Procedures* [Docket No. 1922, ¶ 13], the "fees and expenses of the Fee Examiner, and any counsel retained pursuant to court order, shall be subject to application and review pursuant to section 330 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-1, the U.S. Trustee Guidelines, and the Interim Compensation Order, and shall be paid from the Debtor's estate as an administrative expense under section 503(b)(2) of the Bankruptcy Code. The Fee Examiner's expenses and those of any counsel retained pursuant to court order, shall be subject to the information detail requirements set forth in D.N.J. LBR 2016-1."

3. If the professional requested a waiver as noted below, it is ☐ Granted ☐ Denied.

☐ Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.

☐ Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

4. Traurig will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs including attorney fees and costs, arising from the defense of any of Traurig's fee applications in this case.
5. Traurig will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines").
6. Traurig will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"), among other categories.
7. Traurig will provide any and all monthly fee statements, interim fee applications, and final fee tab applications in "LEDES" or other satisfactory format to the United States Trustee.
8. The effective date of retention is the date the application was filed with the Court.

EXHIBIT B

Certification of Jeffrey Taurig

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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In Re: LTL MANAGEMENT LLC, Debtor	Case No.: 21-30589 (MBK) Judge: Michael B. Kaplan Chapter 11

CERTIFICATION OF JEFFREY TRAURIG

Jeffrey Traurig, under penalty of perjury, certifies as follows:

1. I am the sole member of Traurig Law LLC, I make this certification in accordance with the Local Rules of the United States Bankruptcy Court of New Jersey (the “Local Rules”) regarding the contents of application for compensation.

2. I have read the First Interim Fee Application of Traurig Law for Allowance of Fees as counsel to the Fee Examiner for the Period from March 24, 2022 through May 31, 2022 (the “First Interim Application”).¹

3. The Fee Examiner has been provided with copies of the First Interim Application and prior monthly fee applications referenced therein.

4. I have reviewed the requirements of the Interim Compensation Order, the Guidelines, and the Local Rules, and I believe the First Interim Application complies therewith.

Date: July 19, 2022

/s/ Jeffrey Traurig
Jeffrey Traurig

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the First Interim Application.